

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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	:	CHAPTER 9
IN RE	:	
	:	CASE NO. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	HON. STEVEN W. RHODES
DEBTOR	:	
-----X	:	

**STIPULATION TO ENTRY OF ORDER RESOLVING OMNIBUS CLAIMS
OBJECTION WITH RESPECT TO CLAIMS FILED BY BEATRICE MCQUEEN**

Beatrice McQueen and the City of Detroit, Michigan (the “City”), by and through its undersigned counsel, state as follows in support of the entry of the *Order Resolving Omnibus Claims Objection with Respect to Claims Filed by Beatrice McQueen* attached hereto as **Exhibit 1**.

1. On December 6, 2013, Ms. McQueen filed a proof of claim related to vacation pay she claims is due to her from the City in the amount of \$3,968.00 [Claim No. 159].
2. On February 5, 2014, Ms. McQueen filed a second proof of claim related to vacation pay she claims is due to her from the City in the amount of \$3,968.00 [Claim No. 785].
3. On May 14, 2014, the City filed its *First Omnibus Objection to Certain Claims* [Doc. No. 4792] (the “Claims Objection”) wherein it objected to Claim No. 159 on the basis that it was duplicative of Claim No. 785.
4. Upon discussion by the Parties, Ms. McQueen agreed that Claim No. 159 is duplicative of Claim No. 785 and agreed to withdraw it.
5. The City reserves all of its rights to object to Claim No. 785 on any grounds and Ms. McQueen reserves all of her rights to respond to any such objections.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** resolving the Claim Objection with respect to Ms. McQueen's claims.

Respectfully submitted by:

FOLEY & LARDNER, LLP By: <u>/s/ Tamar N. Dolcourt</u> John A. Simon (P61866) Tamar N. Dolcourt (P 73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com <i>Counsel to the Debtor, City of Detroit</i> <i>Michigan</i> Dated: June 24, 2014	By: <u>/s/ Beatrice McQueen (w/consent)</u> Beatrice McQueen 26533 Blumfield Roseville, MI 48066 Phone: (586) 439-8564 mcqueenbea@yahoo.com
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